DeMaria, Eva

From: MCDONNELL Erin <MCDONNELL.Erin@deq.state.or.us>
Sent: Monday, August 31, 2015 4:29 PM
To: Tom Graf (tom@grafcon.us); 'Brendan Robinson'; Erik Ipsen
Cc: DeMaria, Eva; Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com); PARRETT Kevin; MCCLINCY Matt; LARSEN Henning
Subject: DEQ-EPA Comments on pre-final Basis Design Report, PEO Site (ECSI# 2013)
Attachments: DEQ Letter_PEO GW SCM Design Basis_082815.pdf; EPA Premier Edible Oil BOD DRAFT Comments_20150828.docx

Hi Tom,
Enclosed are DEQ and EPA review comments on the *Basis of Design Report – Groundwater Source Control Measure*, dated July 2015, for the Premier Edible Oils (PEO) site prepared on behalf of MMGL. DEQ agrees with the majority of EPA comments and a few warrant further discussion.

A. The Source Control Evaluation related to groundwater is complete and the source control measure (SCM) consisting of a groundwater barrier wall is chosen. A feasibility study for LNAPL and groundwater source control was completed in 2014, and subsequently DEQ's recommended alternative for groundwater source control measures was presented in which EPA provided comment. Evaluations related to other possible pathways, such as stormwater or erodability of potentially impacted bank soils south of the dock is ongoing.
B. It was also understood with the EPA team at the time of the selected groundwater SCM at PEO, a "stranded wedge" would remain which would be addressed under EPA authority in conjunction with in-water Portland Harbor work. DEQ recommends MMGL engage EPA input to resolve any remaining issues related to the riverside of the barrier wall and in-water considerations.
C. In regards to EPA General Comment 3, DEQ cannot make conclusions whether the current PRG for TPH C10-C12 aliphatic is exceeded given that data is not available; however, the length of the wall merits discussion. Please note, DEQ has recommended that PEO collect C10-C12 fraction data in the future.
D. DEQ is not overly concerned about lateral movement of LNAPL around the barrier wall noted in EPA Specific Comment 8. The LNAPL is considered generally stable at the site and migration of dissolved contaminants may occur with increased travel time. If necessary, agreed upon data can be collected after wall installation and before formal approval of the performance monitoring plan. DEQ advocates for the installation of performance monitoring wells as soon as feasible to establish water quality baselines and monitor remedy progress. In addition, an oxygenation system in-place including near the ends of the wall should lessen concerns related to contaminated groundwater migrating around the wall.
E. To address EPA Comment on Specifications Section 02200-1.01D, it is understood that site soil/groundwater will be encountered and used for the slurry mix. Preliminary compatibility testing with site soils from the LNAPL area has been performed and the final slurry mix will be blended/confirmed by the Contractor. Excess soils/groundwater not utilized in the slurry wall will be contained, properly characterized and disposed at the appropriate offsite location under DEQ oversight.

DEQ is not requiring a revised Basis Design Report but it is our expectation the Final Design Report incorporates required revisions provided by DEQ and EPA on the pre-final report, except where noted above which should be addressed under separate correspondence. DEQ is committed to the project schedule for construction of the SCM this Fall. We also recommend a meeting/call between MMGL representatives, DEQ, and EPA to discuss unresolved design comments. Please propose a few date/times before September 11th or after the 21st.

Please feel free to contact me anytime about the project.
Thank you,
Erin

Erin McDonnell, P.E.
Cleanup Project Engineer

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